

EXHIBIT 2

From: [Dini, Jacob \(SEA\)](#)
To: [Phil Mann](#)
Cc: [Rava, William C. \(SEA\)](#); [Marcelo, Christian W. \(SEA\)](#)
Subject: RE: Bungie, Inc. v. AimJunkies.com, et al., No. 2:21-cv-811-TSZ - Discovery Deficiencies
Date: Monday, October 3, 2022 7:41:04 AM

Phil,

Thanks for the call Friday morning. Below is a summary of what I understand the parties agreed to concerning the issues Bungie identified with Defendants' search and productions, but please correct me if I misunderstood anything.

- Defendants have searched their records for non-PayPal and non-Stripe payment processor documents identified in Bungie's September 21 letter (e.g., Bitcoin, Alipay), and did not find any. This does not mean that no one purchased the cheat software at issue from Defendants through these alternative payment methods, but only that Defendants do not have such records.
- For the AimJunkies promotional emails produced by Phoenix Digital and Mr. Hahn, many of these emails may have been deleted, but you will confirm with your clients and provide at least some samples of the native files (e.g., .msg files) of these emails from each client and let us know no later than **October 7** whether these emails have been deleted and, if not, that your clients will provide samples of the native files.
- Mr. Schaefer deleted the emails concerning the cheat software and this lawsuit that he sent to third parties after the initiation of this lawsuit (e.g., the email mentioned in this video: https://www.youtube.com/watch?v=qlvwOz-q3_0). Mr. Schaefer sent these emails to at least 3-4 industry people. You are going to ask Mr. Schaefer if he can identify those people and let us know by **October 7** whether that is possible.

Jacob Dini | Perkins Coie LLP

ASSOCIATE

1201 Third Avenue Suite 4900

Seattle, WA 98101-3099

D. +1.206.359.3832

F. +1.206.359.4832

E. JDini@perkinscoie.com

From: Phil Mann <phil@mannlawgroup.com>

Sent: Thursday, September 29, 2022 2:42 PM

To: Dini, Jacob (SEA) <JDini@perkinscoie.com>

Cc: Rava, William C. (SEA) <WRava@perkinscoie.com>; Marcelo, Christian W. (SEA)

<CMarcelo@perkinscoie.com>

Subject: Re: Bungie, Inc. v. AimJunkies.com, et al., No. 2:21-cv-811-TSZ - Discovery Deficiencies

Please give me a call at my direct number, 206-617-6964.

Tnx,

Phil

On 9/29/22 2:35 PM, Dini, Jacob (SEA) wrote:

That works. I'll give you a call then. What is the best number to reach you at?

Jacob Dini | Perkins Coie LLP

ASSOCIATE

1201 Third Avenue Suite 4900

Seattle, WA 98101-3099

D. +1.206.359.3832

F. +1.206.359.4832

E. JDini@perkinscoie.com

From: Phil Mann [<phil@mannlawgroup.com>](mailto:phil@mannlawgroup.com)

Sent: Thursday, September 29, 2022 2:21 PM

To: Dini, Jacob (SEA) [<JDini@perkinscoie.com>](mailto:JDini@perkinscoie.com)

Cc: Rava, William C. (SEA) [<WRava@perkinscoie.com>](mailto:WRava@perkinscoie.com); Marcelo, Christian W. (SEA) [<CMarcelo@perkinscoie.com>](mailto:CMarcelo@perkinscoie.com)

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Let's talk tomorrow (Friday) at 11 am.

Tnx,

Phil

On 9/29/22 1:54 PM, Dini, Jacob (SEA) wrote:

Phil,

I write to follow up again on Bungie's September 21 deficiency letter. Please provide times you are available today or tomorrow to discuss.

In addition, Bungie has been made aware that, prior to contrary representations that Defendants did not use email accounts to communicate regarding this matter, Mr. Schaefer has sent emails to third parties since the beginning of this lawsuit, and as recently as this week, concerning the Cheat Software and this case. Some of those emails were discussed in online videos, see e.g., https://www.youtube.com/watch?v=qlvwOz-q3_0. Emails to third parties concerning the Cheat Software are responsive to at least Bungie's RFP No. 8 and must be produced immediately.

Best,

Jacob Dini | Perkins Coie LLP

ASSOCIATE

1201 Third Avenue Suite 4900

Seattle, WA 98101-3099

D. +1.206.359.3832

F. +1.206.359.4832

E. JDini@perkinscoie.com

From: Phil Mann [<phil@mannlawgroup.com>](mailto:phil@mannlawgroup.com)

Sent: Monday, September 26, 2022 3:23 PM

To: Dini, Jacob (SEA) [<JDini@perkinscoie.com>](mailto:JDini@perkinscoie.com)

Cc: Rava, William C. (SEA) [<WRava@perkinscoie.com>](mailto:WRava@perkinscoie.com); Marcelo, Christian W. (SEA) [<CMarcelo@perkinscoie.com>](mailto:CMarcelo@perkinscoie.com)

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Discovery Deficiencies

Thanks Jacob, I'll get back to you as soon as possible. I am through the worst of it.

Phil

On 9/26/22 3:19 PM, Dini, Jacob (SEA) wrote:

Thank you Phil, and sorry to hear that. We hope you have a swift recovery.

Looking forward to hearing from you.

Jacob Dini | Perkins Coie LLP

ASSOCIATE

1201 Third Avenue Suite 4900

Seattle, WA 98101-3099

D. +1.206.359.3832

F. +1.206.359.4832

E. JDini@perkinscoie.com

From: Phil Mann [<phil@mannlawgroup.com>](mailto:phil@mannlawgroup.com)

Sent: Monday, September 26, 2022 3:13 PM

To: Dini, Jacob (SEA) [<JDini@perkinscoie.com>](mailto:JDini@perkinscoie.com)

Cc: Rava, William C. (SEA) [<WRava@perkinscoie.com>](mailto:WRava@perkinscoie.com);
Marcelo, Christian W. (SEA) [<CMarcelo@perkinscoie.com>](mailto:CMarcelo@perkinscoie.com)

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Thanks Jacob,

Unfortunately, I contracted Covid last week and am just getting back on my feet. Sorry about the delay. I'll review this with my clients and get back to you.

Regards,

Phil

On 9/26/22 3:06 PM, Dini, Jacob (SEA) wrote:

Phil,

Following up on the attached letter. Please let us know some times this week that you are available for a meet and confer on these issues.

Best,

Jacob Dini | Perkins Coie LLP

ASSOCIATE

1201 Third Avenue Suite 4900

Seattle, WA 98101-3099

D. +1.206.359.3832

F. +1.206.359.4832

E. JDini@perkinscoie.com

From: Dini, Jacob (SEA)

Sent: Wednesday, September 21, 2022 1:31 PM

To: Phil Mann <phil@mannlawgroup.com>

Cc: Rava, William C. (SEA)

<WRava@perkinscoie.com>; Marcelo, Christian W. (SEA) <CMarcelo@perkinscoie.com>

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Phil,

Please see the attached.

Best,

Jacob Dini | Perkins Coie LLP

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Seattle, WA 98101-3099

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